

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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**MARTEZE HALIBURTON,**

Plaintiff,

v.

Case No. 2:21-cv-10864

Hon. Terrence G. Berg

Mag. Judge Anthony P. Patti

**CITY OF FERNDALE**, a Michigan  
Municipal Corporation, d/b/a **FERNDALE**  
**POLICE DEPARTMENT, BRANDON**  
**SZCZESNIAK, JUSTIN HARWOOD,**  
**KEVIN JEROME**, and **NATHAN**  
**BODENDORFER**, in their individual and  
official capacities,

Defendants.

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**JOEL B. SKLAR (P38338)**

*Attorney for Plaintiff*

500 Griswold, Suite 2450

Detroit, MI 48226

P: (313) 963-4529

E: [joel@joelbsklarlaw.com](mailto:joel@joelbsklarlaw.com)

**PERKINS LAW GROUP, PLLC**

By: Todd Russell Perkins (P55623)

Stephen J. Chacko (P78210)

*Attorneys for Plaintiff*

615 Griswold, Suite 400

Detroit, MI 48226

P: (313) 964-1702

E: [tperkins@perkinslawgroup.net](mailto:tperkins@perkinslawgroup.net)

**SEWARD HENDERSON PLLC**

By: T. Joseph Seward (P35095)

Kali M. L. Henderson (P764479)

Michael A. Knoblock (P77544)

*Attorneys for Defendants*

210 E. 3<sup>rd</sup> Street, Suite 212

Royal Oak, MI 48067

P: (248) 733-3580

F: (248) 733-3633

E: [jseward@sewardhenderson.com](mailto:jseward@sewardhenderson.com)

[khenderson@sewardhenderson.com](mailto:khenderson@sewardhenderson.com)

[mknoblock@sewardhenderson.com](mailto:mknoblock@sewardhenderson.com)

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**STIPULATED PROTECTIVE ORDER**

In order to maintain the confidentiality, goals, and spirit of MCL 15.395, as well as the safety and efficiency of the Ferndale Police Department, the parties agree to the following terms and it is ordered that:

1. All involuntary statements, including any and all compelled statements provided in the course of this litigation are subject to the following, consistent with the MCL 15.395, which requires Courts to preserve the confidentiality of such statements:

- a. That the above described documents shall not be made public, and shall be disclosed to only those directly participating in the present litigation. Under no circumstances shall the documents be disclosed to anyone not regularly employed by Plaintiffs' Counsel's law firm and currently working on this case without prior, written consent from the Defendants;
- b. That Counsel shall obtain the written agreement to abide by the terms of this Protective Order from any person before being shown the above documents, and will provide such agreements to Defendants upon receipt;
- c. No party shall file the above described documents without first requesting that it be done under seal. Parties must strictly follow the requirements under E.D. Mich. LR 5.3. Only the portion of the document(s) which are not to be publicly disclosed may be filed under seal. The portion to be filed under seal requires an endorsement by the Court on a cover page. A party's presentment to the Court for the endorsement shall be accompanied by an explanation why the portion of the document(s) is confidential;
- d. That all of the above documents, including all copies, shall be returned to defense counsel at the conclusion of litigation;

- e. That neither party shall be precluded from raising the issue of admissibility of the above described documents at any court proceeding or any ordered mediation at a later time if necessary.

2. The above protections shall also apply to any internal policy documents of the Ferndale Police Department produced in response to Plaintiff's First Request for Production of Documents.

/s/Terrence G. Berg  
HONORABLE TERRENCE G. BERG  
United States District Judge

Dated: May 16, 2022

Approved as to Form:

/s/Joel B. Sklar (P38338)  
**JOEL B. SKLAR (P38338)**  
*Attorney for Plaintiff*  
500 Griswold, Suite 2450  
Detroit, MI 48226  
P: (313) 963-4529  
E: joel@joelbsklarlaw.com

/s/Kali M. L. Henderson  
**SEWARD HENDERSON PLLC**  
*Attorneys for Defendants*  
210 East 3rd, Ste. 212  
Royal Oak, MI 48067  
P: (248) 733-3580  
E: khenderson@sewardhenderson.com

Dated: May 12, 2022